
GL 2004-02

90 Day Responses



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General Impressions

- All responses submitted early or on time
- On the whole, the responses met or exceeded expectations
- Many plants appear to have either not started or not be far along in performing the evaluation
- 42 plant have completed containment walkdowns



Observations

- One unit identified that they will miss 12/07 deadline. Requesting an extension. No JCO provided.
- A number of licensees indicated that they will need to update their September 2005 response as new information comes available on several technical issues such as chemical effects and downstream effects



Message to Industry

- Delays in addressing chemical and downstream effects
 - Will result in a September response not fully responsive to GL information request
 - May result in reanalysis and redesign of solutions if sufficient margin not incorporated
 - May jeopardize your ability to meet the 12/07 completion date
 - Delaying won't make the problem go away
 - Research shows chemical effects to exist
 - Industry responsible for evaluating headloss and downstream impacts



Message to Industry

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- Few plants identified potential licensing actions
 - Please don't surprise us. Let us know of potential licensing action requests
- If it appears 12/07 completion in jeopardy, engage us early
- If you are taking exceptions/refinements to the approved methodology, ensure they are documented (with justification) in the Sep 05 response
- We need your JCO to extend operations past 12/07 early so we have adequate review time



September Response Expectations

- Licensees need to identify in the cover letter any milestone that won't be met, particularly the 12/07 date. If the 12/07 date will not be met, the response needs to provide a JCO for our review.
- If any implementation dates are considered company proprietary, it is acceptable to identify those dates as Spring, Fall 200X as appropriate as long as the DLPM project manager is informed of the actual date.



September Response Expectations

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- As with the 90-day responses, the staff expects licensees to identify the methodology used in their analysis (licensees can reference their 90-day responses). If there are exceptions to the use of the NEI methodology, those exceptions need to be identified and described.
 - If a licensee uses a methodology other than the NEI methodology, a detailed description of that methodology should be provided. A licensee using a different methodology should understand that further communications with the staff will likely occur after the receipt of their response.



September Response Expectations

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- The description of planned or existing programmatic controls that will ensure that potential sources of debris introduced into containment will be assessed for adverse effects on ECCS/CSS functions needs to specific, in detail, and include copies of documentation, if possible.
 - If any analyses, design work, etc. was or will be performed by a contractor, please identify the contractor



September Response Expectations

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- Overall, the response needs to be complete and detailed enough to show that the licensee adequately exercised the guidance for evaluating sumps
- It is expected that there will not be any areas still requiring evaluation
- Licensees are free to update their responses as necessary if any changes result from confirmation containment walkdowns

